

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 18-16185-MDC
Louise C. Bruce a/k/a Louise Collins-Bruce	:	Chapter 13
Debtor	:	
U.S. Bank National Association, not in its	:	
individual capacity but solely as trustee for the	:	
RMAC Trust, Series 2016-CTT c/o Rushmore	:	
Loan Management Services	:	
Movant	:	
vs.	:	
Louise C. Bruce a/k/a Louise Collins-Bruce	:	
Debtor/Respondent	:	
and	:	
William C. Miller, Esquire	:	
Trustee/Respondent	:	

OBJECTION TO CONFIRMATION OF THE PLAN

Movant, U.S. Bank National Association, not in its individual capacity but solely as trustee for the RMAC Trust, Series 2016-CTT c/o Rushmore Loan Management Services (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Louise C. Bruce a/k/a Louise Collins-Bruce (“Debtor”), as follows:

1. As of the bankruptcy filing date of September 18, 2018, Movant holds a secured Claim against the Debtor’s property located at 3000 Hetherton Drive, Aston, PA 19014.

2. Movant is in the process of filing a Proof of Claim by the 11/27/2018 bar date, with an estimated secured claim in the amount of \$304,125.34, and estimated pre-petition arrears in the amount of \$69,976.56.

3. The Plan currently proposes payment to Movant in the amount of \$61,715.73 for pre-petition arrears.

4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).

5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: 10/24/2018

s/Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
Attorney I.D. # 81747
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: :
Louise C. Bruce a/k/a Louise Collins-Bruce :
Debtor/Respondent :
and :
William C. Miller, Esquire :
Trustee/Respondent :

**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED
PLAN TO PARTIES IN INTEREST**

I, Danielle Boyle-Ebersole, Esquire, attorney for U.S. Bank National Association, not in its individual capacity but solely as trustee for the RMAC Trust, Series 2016-CTT c/o Rushmore Loan Management Services (“Movant”), certify that I served a copy of the attached Objection to the Plan to the parties below on **10/24/2018**:

David B. Spitoftsky, Esquire Via ECF <i>Attorney for Debtors</i>	Louise C. Bruce a/k/a Louise Collins-Bruce 3000 Hetherton Drive Aston, PA 19014 Via First Class Mail <i>Debtors</i>
William C. Miller, Esquire Via ECF <i>Trustee</i>	

Date: 10/24/2018

Respectfully Submitted,
s/Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
Attorney I.D. # 81747
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